

SPEARS & IMES LLP

767 Third Avenue
New York, NY 10017
tel 212 213-6996
fax 212 213-0849

Reed M. Keefe
tel 212-897-4485
rkeefe@spearsimes.com

*Application
GRANTED
ORDERED
January 18, 2023
JMK USDS
1-20-23*

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Andrew Brown, S1 20 Cr. 470 (PKC)*

Dear Judge Castel:

We write on behalf of Andrew Brown to modify our prior request for permission for Mr. Brown to travel to the Northern District of New York on January 20 or 21, which the Court granted yesterday. (ECF Nos. 174-75.) We now respectfully request that Mr. Brown's conditions of pretrial release be modified to allow him to travel to the N.D.N.Y. on January 24 and to return the same day.

Due to a death in Mr. Brown's family, and the timing of the funeral early next week, Mr. Brown would like to drive his son back to college in Cortland, New York, on January 24, rather than on the previously requested dates.

Neither the Government nor the Pretrial Services Officer supervising Mr. Brown objects to this application.

Thank you for your consideration of this request.

Respectfully submitted,

/s Reed M. Keefe

Max Nicholas
Reed M. Keefe
Attorneys for Andrew Brown

cc: All Counsel via ECF